

REMARKS

The Office Action of January 23, 2005 has been carefully considered. Reconsideration and allowance in view of the following remarks is respectfully requested.

Claims 1-4 were rejected as being unpatentable over Rivest in view of Sinclair and Estakhri. This rejection is respectfully traversed.

The present invention relates methods and apparatus for minimizing erasures of a memory medium. As recited in claim 1, a logical series of multiple memory locations is identified and is treated in effect as a single logical memory location. A value to be stored is encoded and written initially to a first location in the series. As the value is to be modified to a new value, the new value is encoded taking into account the current encoded value and, if feasible, stored in the current location; if not feasible (i.e., because of code exhaustion), then the encoded new value is written to a next available location; or, if there is no next location available, the contents of the locations in the series are reset.

In Rivest, there is no identification of a logical series of multiple memory locations. A particular location may be rewritten only once. No provision is made for subsequent modification.

Sinclair also fails to teach or suggest the logical series of multiple memory locations performing the functions set forth in claim 1.

Estakhri does not contain any relevant teaching about the manner in which data itself is stored. Instead, Estakhri speaks to the way in which address information is stored. In particular, Estakhri teaches an arrangement in which a flash memory, in addition to data blocks, includes correlations blocks. Like the data blocks, the correlation blocks are organized into sectors, each sector containing multiple fields. Each logical memory address is uniquely mapped to one of the fields. That field is used to store the physical memory address within the data portion of the memory where the data corresponding to the logical address is stored.

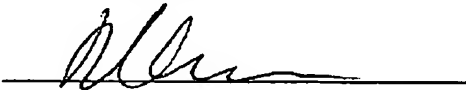
When the physical address of a data item changes (for example, when data is modified and rewritten to the memory but the old data is not overwritten), the physical address in the corresponding correlation block is overwritten.

Estakhri does not identify in advance a series of locations for use in storing successive versions of a piece of data in the manner recited in claim 1.

Hence, it may be seen that Estakhri in no way teaches or suggests those features of the invention absent from Rivest.

Withdrawal of the rejection and allowance of claims 1-4 is respectfully requested.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'Michael J. Ure', is written over a horizontal line.

Michael J. Ure, Reg. 33,089